

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

BRUCE WOODS,

Petitioner,

vs.

WANZA JACKSON,

Respondent.

Case No. 1:00cv803

Judge Spiegel
M.J. Black

**PETITIONER'S MOTION FOR AN EXTENSION OF TIME FOR FILING
OBJECTIONS TO THE NOVEMBER 8, 2005 REPORT AND RECOMMENDATION**

Petitioner Woods, through counsel, respectfully requests on extension on the deadline for filing objections to the Magistrate Judge's November 8, 2005 Report and Recommendation. The objections are currently due by November 22, 2005 (calculated without adding three days for being "e-served" by the Clerks office). Petitioner requests that the due date be extended to December 5, 2005. On November 18, 2005 Respondent's counsel Stuart Cole told Petitioner's counsel Meyers that Respondent does not object to this request.

Respectfully Submitted,

DAVID H. BODIKER
OHIO PUBLIC DEFENDER

s/Gregory W. Meyers
GREGORY W. MEYERS (0014887)
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COUNSEL FOR PETITIONER

MEMORANDUM IN SUPPORT

Due to professional commitments and personal plans for the upcoming Thanksgiving Holiday, Petitioner counsel's request an extension of the deadline for filing objections to the 11-08-05 Report and Recommendation. Petitioner's counsel faces other deadlines and responsibilities that prompt this extension request, including a 11-28-05 deadline to file for a discretionary appeal in the Ohio Supreme Court on a case counsel only recently picked up; a 11-28-05 deadline to prepare an "expert affidavit" for filing in an Ohio capital post-conviction petition (which entails analyzing the trial transcript and record); and a responsibility that came up on 11-17-05 (per a request for the Ohio Attorney General's Office) to search through fairly voluminous, old Office records (dating back as far as 1984) for matters related to the DNA tests underway for capital inmate John Spirko. In addition, Petitioner's counsel would appreciate it if this Court would accommodate this request, which would, in turn, permit him to adjust his work schedule so that he could travel with his daughter for a long Thanksgiving weekend with extended family in the Cleveland area.

Respectfully Submitted,

DAVID H. BODIKER
OHIO PUBLIC DEFENDER

s/Gregory W. Meyers
GREGORY W. MEYERS (0014887)
Senior Assistant Public Defender

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COUNSEL FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing PETITIONER'S MOTION FOR AN EXTENSION OF TIME FOR FILING OBJECTIONS TO THE NOVEMBER 8, 2005 REPORT AND RECOMMENDATION was filed electronically on November 18, 2005. Notice of this filing will be sent to all parties by operation of the court's electronic filing system, through which parties may access copies of this document.

s/Gregory W. Meyers
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